

10. Program Assessment and Reporting

10.1. Overview

The purpose of this chapter is to describe the methodology MDOT will use to prepare and submit an annual progress report. This report is due on or October 1 of each year and must be submitted to the appropriate MDEQ District Supervisor. This chapter is organized as follows:

- Section 10.2. describes the general format of the annual report.
- Section 10.3. describes how non-compliance issues will be reported and how compliance assessment will be recorded in the annual report.
- Section 10.4. describes how MDOT will report the environmental impacts that it has had over the past year.
- Section 10.5. describes how the data and results will be reported and how records will be stored.
- Section 10.6. describes how MDOT will report upcoming activities.
- Section 10.7. describes how MDOT will report BMP changes.
- Section 10.8. describes the notification requirements to the MDEQ.
- Section 10.9. describes the notification process for when additional point source discharges are identified.
- Section 10.10. describes how changes are made to the Storm Water Management Plan.

10.2. Annual Report

The annual report will fulfill permit requirements, as well as serve as a self-audit for MDOT on how progress is being made toward accomplishment of tasks set forth by this Storm Water Management Plan. On or before October 1, 2002, the first annual report describing the progress toward compliance with requirements of the Permits within the five Phase I regulated communities will be submitted to the appropriate MDEQ District Supervisor for approval. This report will follow the same format as subsequent reports, and will report on compliance with the storm water management plan approved on February 27, 1998, as amended. Subsequent reports will report on compliance with the current permit conditions. The basic chapter outline of the Annual Report will be as follows:

1. Overview
2. Program Management
3. Public Education BMPs
4. Public Involvement/Participation BMPs
5. Illicit Discharge Elimination BMPs
6. Post construction for New Development and Redevelopment Project BMPs
7. Construction Storm Water Runoff Control BMPs
8. Pollution Prevention/Good Housekeeping BMPs

9. Reporting
 - 9.1. Overview
 - 9.2. Compliance Assessment
 - 9.3. Environmental Impacts
 - 9.4. Data and Results
 - 9.5. Upcoming Activities
 - 9.6. BMP Changes
 - 9.7. Notices of Changes in Reliance on Permitted Drainage System Operators
 - 9.8. Drainage System Changes
 - 9.9. Revised Fiscal Analysis
 - 9.10. Annual Budget
10. Location Specific issues

10.3. Compliance Assessment

During each annual report, MDOT will report on the progress made toward complying with the Storm Water Management Plan and the Permit. The first annual report will describe compliance with the September 18, 1996, Permit. This will include an assessment and reporting of certain measurable goals made by MDOT to improve the Illicit Discharge Elimination Program (IDEP), pollution prevention measures, public education actions, and construction dealings. Similar assessment and goals will be discussed in the subsequent annual reports although reporting will focus on the assessment of the appropriateness of all BMPs and work that has been accomplished towards meeting the measurable goals for these BMPs.

10.4. Environmental Impacts

An assessment of the pollution reduction and probable receiving water quality impacts associated with the program implementation will be provided with the annual reports beginning in 2003. When applicable, a statement will be included regarding negative water quality impacts that may have occurred as a result of illicit discharges or accidental spills during the previous year.

10.5. Data and Results

MDOT will provide a summary of relevant data gathered over the reporting period in each annual report for assessment reasons.

10.6. Upcoming Activities

MDOT will report a summary of the storm water activities to be implemented during the next reporting period in each annual report. This summary will also include schedules for elimination of the illicit connections that were identified but were not disconnected prior to annual report submittal. Upcoming activities will most likely be tasks identified on the implementation schedules in each BMP section of this plan.

10.7. BMP Changes

With new technology and research being developed each day, it is likely that during the period of this SWMP, new and improved technology will be identified for BMPs. BMPs presented as part of this plan may be found to not be effective. To keep current with the

latest knowledge and technology, the MDOT will report any planned changes in identified BMPs or measurable goals for any of the minimum measures in each annual report.

10.8. Notification Requirements

Notification requirements are contained in Part I, Section C.2 of the permit. These requirements include the following:

Notify the MDEQ, by the MDOT Storm Water Program Coordinator, verbally within 24 hours of becoming aware of any discharges to the drainage system that may endanger public health or the environment if the discharges are from facilities/sites that are not complying or will be unable to comply with the following:

- Requirements of an NPDES permit, including an individual permit, a general permit, or the Permit-by-Rule for storm water discharges from construction sites;
- Requirements of a State of Michigan permit for soil erosion and sedimentation control pursuant to Part 91 of P.A. 451 of 1994;
- Requirements of a State of Michigan permit for discharge of liquid wastes to groundwater pursuant to the Michigan Act;
- Requirements of Part 5 (Polluting Materials) of the administrative rules promulgated under the Michigan Act; or
- Part 4 Water Quality Standards.

Non-compliance, as described above, which does not pose imminent danger to public health or the environment shall be reported either verbally or in writing within five (5) days of becoming aware of the problem.

Submit written documentation to the MDEQ within fourteen (14) days of having knowledge of any reason MDOT is not complying with or will be unable to comply with any condition specified in this permit. Written documentation shall include the following information:

- A description of the circumstances, including the type of noncompliance.
- The period of noncompliance, if known, including dates and time; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate and prevent recurrence of the noncompliance.
- For illegal discharges to the system, the estimated volume of discharge, a description of the type of pollutants in the discharge, the location of the discharge into the system, the location of the outfall from which the discharge enters waters of the state, identification of the parties responsible for the discharge, if known, and the facility or the construction site from which the discharge originated, if known.

10.9. Identification of Additional Point Source Discharges of Storm Water

The MDEQ will be notified by the MDOT Storm Water Program Coordinator within thirty (30) days of newly identified or constructed point source discharges from the MDOT system discharging either to Waters of the State or to a drainage system operated by another public body or statutory housing authority. Information conveyed to the MDEQ will include the location of the discharge, if coverage of the additional storm water discharge is being requested, and the name of the receiving water or other drainage system operator that receives the discharge.

10.10. Storm Water Management Plan Modifications

Modifications to the storm water management plan are inevitable as the program develops and progresses. Modification may be either initiated by MDOT as program changes are desired or by the MDEQ to address contributions of discharges that are impairing receiving water quality or changes necessary to comply with state or federal requirements. Requested modifications will be submitted to the MDEQ for approval and will include summary information as to the reason for the requested changes.